

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC VERIFIED JOINT APPLICATION)	
OF EASTERN ROCKCASTLE WATER)	
ASSOCIATION, INC. AND KENTUCKY-)	CASE NO.
AMERICAN WATER COMPANY FOR THE)	2017-00383
TRANSFER OF CONTROL AND ASSETS)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO
EASTERN ROCKCASTLE WATER ASSOCIATION, INC. AND KENTUCKY-
AMERICAN WATER COMPANY

Kentucky-American Water Company ("Kentucky American") and Eastern Rockcastle Water Association, Inc. ("Eastern Rockcastle") (collectively, "Joint Applicants"), pursuant to 807 KAR 5:001, are to file with the Commission the original and six copies in paper medium and an electronic version of the following information. The information requested herein is due December 4, 2017. Responses to requests for information in paper medium shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Joint Applicants shall make timely amendment to any prior response if they obtain information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which the Joint Applicants fail or refuse to furnish all or part of the requested information, they shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, the Joint Applicants shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Joint Applicants' response to Commission Staff's First Request for Information ("Staff's First Request"), Item 1. The Eastern Rockcastle Board of Directors' meeting minutes indicate that Western Rockcastle Water Association ("Western Rockcastle") proposed entering into an operational contract with Eastern Rockcastle. The meeting minutes further indicate that no action was taken by Eastern Rockcastle's Board of Directors with regard to the Western Rockcastle proposal.

- a. Provide a copy of Western Rockcastle's proposed operational contract.

b. State whether Eastern Rockcastle engaged in negotiations with Western Rockcastle concerning the proposed operational contract.

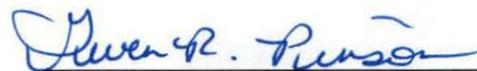
c. Provide a detailed explanation as to why Eastern Rockcastle did not accept Western Rockcastle's proposal.

d. Provide a detailed explanation as to why Eastern Rockcastle chose to accept Kentucky American's proposal over Western Rockcastle's proposal.

2. Refer to the Joint Applicants' response to Staff's First Request, Item 2. As previously requested, provide a list of all assets that Kentucky American will acquire from Eastern Rockcastle, as well as a list of all assets that are excluded from the transfer.

3. Refer to the Joint Applicants' response to Staff's First Request, Item 4. State whether Kentucky American will require customer deposits if the transfer is approved. If so, provide the monetary deposit amount that each customer classification will be charged.

4. Refer to Joint Applicants' response to Staff's First Request, Item 11. Provide the job titles of Rodney Trowbridge with Eastern Rockcastle, and Dave Messer with the Kentucky Division of Water, and a summary of the informal conversation(s) that occurred between them concerning the pending transfer.



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED NOV 17 2017

cc: Parties of Record

Case No. 2017-00383

*Eastern Rockcastle Water Association, Inc.
9246 Main Street
Livingston, KY 40445

*James W Gardner
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KENTUCKY 40507

*Honorable Lindsey W Ingram, III
Attorney at Law
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801

*Kentucky-American Water Company aka
2300 Richmond Road
Lexington, KY 40502

*Linda C Bridwell
Director Engineering
Kentucky-American Water Company aka Kentucky
2300 Richmond Road
Lexington, KY 40502

*Monica Braun
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801

*M. Todd Osterloh
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KENTUCKY 40507